



May 3, 2023

**Via ECF**

Hon. Lorna G. Schofield  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Sure Fit Home Products LLC et al v. Maytex Mills, Inc.*  
Civil Action No. 21 Civ. 2169 (LGS)

Dear Judge Schofield:

We are counsel to Plaintiffs in the above matter. We are writing on behalf of all parties to request a two-week extension of the May 3<sup>rd</sup> due date to restore this matter to the calendar (Dkt. 232), so as to facilitate completion of the settlement.

It is Plaintiffs' understanding that all points of settlement have been resolved based on discussions yesterday between the parties' principals, such that the parties are very close to executing a final version of the written agreement. As such, we are awaiting Maytex's review and execution of the final document (including some exhibits and a signed copy of the Stipulation of Dismissal from opposing counsel). We have been informed, however, by Maytex's co-counsel Mr. Towner, that lead counsel Mr. Morseberg is currently traveling. As a result, Mr. Towner has requested that we obtain a two-week extension from the Court.

Further to Your Honor's Individual Rule I.B.2: (1) the original due date to restore this action is May 3, 2023, and the parties seek a new date of May 17, 2023; (2, 3) there have been no previous requests for an extension of this date; and (4) all parties join in this request.

In the alternative, Plaintiffs respectfully request restoration of this matter to the calendar to avoid loss of any rights.

We thank the Court in advance for its attention to this matter.

Respectfully submitted,

/s/ *Morris E. Cohen*

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